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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	No. CR 14-00614 WHO
14 Plaintiff,)	
15 v.)	STIPULATION AND ORDER TO CONTINUE
16 PAUL WOODWARD and)	
17 KAREN KRAMER,)	
18 Defendants.)	
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20 This matter is set for a status / trial setting hearing on Thursday, November 19, 2015. The
21 parties jointly request that the hearing be continued to December 10, 2015 for the following reasons.

22 Since the last appearance before the Court, the parties have had conversations and have met to
23 discuss possible resolution, as well as issues that would need to be addressed prior to any trial in this
24 matter. The parties are continuing these discussions and believe that three additional weeks will allow
25 the parties to determine whether resolutions can be reached, and if not, time to discuss dates for motions
26 and trial. Also, since the last appearance before this Court, counsel for defendant Kramer has new
27 counsel, AFD Ellen Leonida, who entered a Notice of Appearance on September 29, 2015. ECF 61.
28 The parties believe that based on the need for counsel to continue to review the facts of the case and

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1 legal issues as part of plea discussions that time should be excluded from Speedy Trial Act calculations
2 for effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv)

3 SO STIPULATED.

4 DATED: November 18, 2015

BRIAN J. STRETCH
Acting United States Attorney

/s/

DENISE MARIE BARTON
KYLE F. WALDINGER
Assistant United States Attorneys

9 DATED: November 18, 2015

/s/

THOMAS J. NOLAN, Jr.
Counsel for the defendant
PAUL WOODWARD

12 DATED: November 18, 2015

/s/

ELLEN LEONIDA
Counsel for the defendant
KAREN KRAMER

15 ORDER

16 Based on these facts, the Court grants the parties request and continues this matter for status /
17 trial setting until December 10, 2015 at 1:30 pm. The Court further finds that, taking into the account
18 the public interest in the prompt disposition of criminal cases that granting the continuance until
19 December 10, 2015 is necessary for effective preparation of counsel and that the ends of justice served
20 by excluding the period from November 19, 2015, to December 10, 2015, outweigh the best interest of
21 the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), 3161(h)(7)(B)(iv).
22 Accordingly, and with the consent of the parties, the Court orders that the period from November 19,
23 2015, to December 10, 2015 be excluded from Speedy Trial Act calculations under 18 U.S.C. §
24 3161(h)(7)(A) and (B)(iv).

26 IT IS SO ORDERED.

27 DATED: November 19, 2015

28 
HON. WILLIAM H. ORRICK
United States District Judge

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